

In re:
2nd Chance Investment Group, LLC
NBCUniversal LLC
Debtors

Case No. 22-12142-SC
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0973-8

User: admin

Page 1 of 4

Date Rcvd: Mar 10, 2025

Form ID: pdf042

Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Mar 12, 2025:

Recip ID	Recipient Name and Address
db	+ 2nd Chance Investment Group, LLC, 600 W. Santa Ana Blvd., PMB 5045, Santa Ana, CA 92701-4558

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
intp	*+	2nd Chance Investment Group, LLC, 600 W. Santa Ana Blvd., PMB 5045, Santa Ana, CA 92701-4558

TOTAL: 0 Undeliverable, 1 Duplicate, 0 Out of date forwarding address

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Mar 12, 2025

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on March 10, 2025 at the address(es) listed below:

Name	Email Address
Adam N Barasch	on behalf of Defendant Ford Motor Credit Company LLC anb@severson.com, cr@severson.com
Amanda G. Billyard	on behalf of Debtor 2nd Chance Investment Group LLC abillyard@bwlawcenter.com
Andrew Michael Cummings	on behalf of Defendant NBCUniversal Media LLC andrew.cummings@hklaw.com philip.dobbs@hklaw.com;hapi@hklaw.com;sandy.olalde@hklaw.com
Andrew Michael Cummings	on behalf of Defendant NBCUniversal LLC andrew.cummings@hklaw.com

District/off: 0973-8

User: admin

Page 2 of 4

Date Rcvd: Mar 10, 2025

Form ID: pdf042

Total Noticed: 1

philip.dobbs@hklaw.com;hapi@hklaw.com;sandy.olalde@hklaw.com

Andy C Warshaw

on behalf of Defendant 2nd Chance Investment Group LLC awarshaw@bwlawcenter.com
warshaw.andyb110606@notify.bestcase.com

Andy C Warshaw

on behalf of Debtor 2nd Chance Investment Group LLC awarshaw@bwlawcenter.com,
warshaw.andyb110606@notify.bestcase.com

Andy C Warshaw

on behalf of Defendant 2nd Chance Investment Group LLC awarshaw@bwlawcenter.com,
warshaw.andyb110606@notify.bestcase.com

Annie Y Stoops

on behalf of Defendant Gold Depot Inc. annie.stoops@afslaw.com, yvonne.li@afslaw.com;mia.ferguson@afslaw.com

Arjun P Rao

on behalf of Defendant Discover Bank arjun.rao@morganlewis.com lalacalendar@stroock.com

Arvind Nath Rawal

on behalf of Creditor Ally Bank c/o AIS Portfolio Services, LLC arawal@aisinfo.com

Brandon J. Iskander

on behalf of Interested Party Goe Forsythe & Hodges LLP biskander@goeforlaw.com kmurphy@goeforlaw.com

Brittney Leyva

on behalf of Defendant Google LLC bleyva@mayerbrown.com
2396393420@filings.docketbird.com;KAWhite@mayerbrown.com;ladoocket@mayerbrown.com

Bryant S Delgadillo

on behalf of Defendant JPMorgan Chase Bank N.A bryant.delgadillo@piblaw.com, rhonda.viers@piblaw.com

Charity J Manee

on behalf of Plaintiff Official Committee of Unsecured Creditors cmanee@goeforlaw.com kmurphy@goeforlaw.com

Charity J Manee

on behalf of Creditor Committee Official Committee of Unsecured Creditors cmanee@goeforlaw.com kmurphy@goeforlaw.com

Charity J Manee

on behalf of Plaintiff Official Committee Of Unsecured Creditors cmanee@goeforlaw.com kmurphy@goeforlaw.com

Charity J Manee

on behalf of Interested Party Goe Forsythe & Hodges LLP cmanee@goeforlaw.com kmurphy@goeforlaw.com

Cheryl A Skigin

on behalf of Creditor Ally Bank caskigin@earthlink.net caskigin@earthlink.net

Christopher P. Walker

on behalf of Interested Party Salvador Jimenez cwalker@cpwalkerlaw.com
lhines@cpwalkerlaw.com;r57253@notify.bestcase.com

Christopher P. Walker

on behalf of Creditor Salvador Jimenez cwalker@cpwalkerlaw.com lhines@cpwalkerlaw.com;r57253@notify.bestcase.com

D Edward Hays

on behalf of Defendant Walker Law Group LLP ehays@marshackhays.com,
ehays@ecf.courtdrive.com;alinares@ecf.courtdrive.com;cmendoza@marshackhays.com;cmendoza@ecf.courtdrive.com

Dane W Exnowski

on behalf of Creditor Forethought Life Insurance Company dane.exnowski@mccalla.com
bk.ca@mccalla.com,mccallaecf@ecf.courtdrive.com

Dane W Exnowski

on behalf of Interested Party Courtesy NEF dane.exnowski@mccalla.com bk.ca@mccalla.com,mccallaecf@ecf.courtdrive.com

Daniel J Griffin

on behalf of Plaintiff Maher Abou Khzam daniel@thebklawoffice.com
tclayton@thebklawoffice.com;daniel@thebklawoffice.com

David M Goodrich

on behalf of Interested Party Courtesy NEF dgoodrich@go2.law
kadele@go2.law;dfitzgerald@go2.law;wgglp@ecf.courtdrive.com

David M Goodrich

on behalf of Other Professional David M Goodrich dgoodrich@go2.law
kadele@go2.law;dfitzgerald@go2.law;wgglp@ecf.courtdrive.com

David M Goodrich

on behalf of Defendant David M Goodrich dgoodrich@go2.law
kadele@go2.law;dfitzgerald@go2.law;wgglp@ecf.courtdrive.com

David M Goodrich

District/off: 0973-8

User: admin

Page 3 of 4

Date Rcvd: Mar 10, 2025

Form ID: pdf042

Total Noticed: 1

on behalf of Debtor 2nd Chance Investment Group LLC dgoodrich@go2.law,
kadele@go2.law;dfitzgerald@go2.law;wgllp@ecf.courtdrive.com

Douglas A Plazak

on behalf of Creditor Ram Bhakta dplazak@rhlaw.com

Douglas A Plazak

on behalf of Creditor Sajan Bhakta dplazak@rhlaw.com

Douglas A Plazak

on behalf of Attorney Douglas A. Plazak dplazak@rhlaw.com

Eric J Fromme

on behalf of Defendant Meta Platforms Inc. eric.fromme@afslaw.com, yvonne.li@afslaw.com

Fanny Zhang Wan

on behalf of Interested Party U.S. Bank Trust National Association not in its individual capacity but solely as owner trustee for
VRMTG Asset Trust Fanny.Wan@mccalla.com, mccallaecf@ecf.courtdrive.com

Fanny Zhang Wan

on behalf of Creditor U.S. BANK TRUST NATIONAL ASSOCIATION NOT IN ITS INDIVIDUAL CAPACITY BUT
SOLELY AS OWNER TRUSTEE FOR VRMTG ASSET TRUST Fanny.Wan@mccalla.com, mccallaecf@ecf.courtdrive.com

Gary B Rudolph

on behalf of Creditor Lantzman Investments Inc. grudolph@fennemorelaw.com,
bkstaff@sullivanhill.com;vidovich@ecf.inforuptcy.com;rudolph@ecf.courtdrive.com;kcashman-kramer@fennemorelaw.com;eja
mes@fennemorelaw.com;james@ecf.courtdrive.com

Gary B Rudolph

on behalf of Creditor LMF2 LP grudolph@fennemorelaw.com,
bkstaff@sullivanhill.com;vidovich@ecf.inforuptcy.com;rudolph@ecf.courtdrive.com;kcashman-kramer@fennemorelaw.com;eja
mes@fennemorelaw.com;james@ecf.courtdrive.com

Guy R Bayley

on behalf of Defendant Innovision LLC guy@bayleyco.com, bayley.guyr99578@notify.bestcase.com

Jennifer C Wong

on behalf of Creditor Wells Fargo Bank N.A. bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

Jennifer C Wong

on behalf of Interested Party Courtesy NEF bknotice@mccarthyholthus.com jwong@ecf.courtdrive.com

Kathleen A Cashman-Kramer

on behalf of Creditor Lantzman Investments Inc. kcashman-kramer@fennemorelaw.com, theresam@psdslaw.com

Kathleen A Cashman-Kramer

on behalf of Creditor LMF2 LP kcashman-kramer@fennemorelaw.com, theresam@psdslaw.com

Kenneth Miskén

on behalf of U.S. Trustee United States Trustee (SA) Kenneth.M.Miskén@usdoj.gov

Lazaro E Fernandez

on behalf of Interested Party Courtesy NEF lef17@pacbell.net
lef-sam@pacbell.net;lef-mari@pacbell.net;OfficeLR74738@notify.bestcase.com;lefkarina@gmail.com

Matthew D. Resnik

on behalf of Defendant Rayshon Andrew Foster matt@rhmfirm.com
roksana@rhmfirm.com;sloan@rhmfirm.com;nina@rhmfirm.com;david@rhmfirm.com;priscilla@rhmfirm.com;gabriela@rhmfirm
.com;rosario@rhmfirm.com;rebeca@rhmfirm.com;LA@rhmfirm.com

Matthew D. Resnik

on behalf of Other Professional Matthew Resnik matt@rhmfirm.com
roksana@rhmfirm.com;sloan@rhmfirm.com;nina@rhmfirm.com;david@rhmfirm.com;priscilla@rhmfirm.com;gabriela@rhmfirm
.com;rosario@rhmfirm.com;rebeca@rhmfirm.com;LA@rhmfirm.com

Matthew D. Resnik

on behalf of Defendant Advance Real Estate & Construction Solutions Corporation matt@rhmfirm.com,
roksana@rhmfirm.com;sloan@rhmfirm.com;nina@rhmfirm.com;david@rhmfirm.com;priscilla@rhmfirm.com;gabriela@rhmfirm
.com;rosario@rhmfirm.com;rebeca@rhmfirm.com;LA@rhmfirm.com

Matthew D. Resnik

on behalf of Defendant Rayshon Andrew Foster matt@rhmfirm.com
roksana@rhmfirm.com;sloan@rhmfirm.com;nina@rhmfirm.com;david@rhmfirm.com;priscilla@rhmfirm.com;gabriela@rhmfirm
.com;rosario@rhmfirm.com;rebeca@rhmfirm.com;LA@rhmfirm.com

Matthew S Henderson

on behalf of Defendant JPMorgan Chase Bank N.A matthew.henderson@piblaw.com, rhonda.viers@piblaw.com

Michael G Spector

on behalf of Defendant Gemma's Jewelers Inc. mgspector@aol.com, mgslawoffice@aol.com

Michael Jay Berger

on behalf of Other Professional Michael Jay Berger michael.berger@bankruptcypower.com

District/off: 0973-8

User: admin

Page 4 of 4

Date Rcvd: Mar 10, 2025

Form ID: pdf042

Total Noticed: 1

yathida.nipha@bankruptcypower.com;michael.berger@ecf.inforuptcy.com

Michael Jay Berger

on behalf of Attorney Michael Jay Berger michael.berger@bankruptcypower.com
yathida.nipha@bankruptcypower.com;michael.berger@ecf.inforuptcy.com

Michael Jay Berger

on behalf of Defendant Sonja Foster michael.berger@bankruptcypower.com
yathida.nipha@bankruptcypower.com;michael.berger@ecf.inforuptcy.com

Misty A Perry Isaacson

on behalf of Defendant Lightmark Media misty@ppilawyers.com ecf@ppilawyers.com;pagterandperryisaacson@jubileebk.net

Randall P Mroczynski

on behalf of Creditor Mercedes-Benz Financial Services USA LLC randym@cookseylaw.com

Richard L. Sturdevant

on behalf of Defendant 2nd Chance Investment Group LLC rich@bwlawcenter.com

Richard L. Sturdevant

on behalf of Defendant 2nd Chance Investment Group LLC rich@bwlawcenter.com

Richard L. Sturdevant

on behalf of Debtor 2nd Chance Investment Group LLC rich@bwlawcenter.com

Robert G Uriarte

on behalf of Defendant General Outdoor Advertising rgulawoffice@gmail.com

Robert P Goe

on behalf of Interested Party Goe Forsythe & Hodges LLP kmurphy@goeforlaw.com
rgoe@goeforlaw.com;goeforecf@gmail.com;Goe.RobertP.R@notify.bestcase.com;ajohnston@goeforlaw.com

Robert P Goe

on behalf of Creditor Committee Official Committee of Unsecured Creditors kmurphy@goeforlaw.com
rgoe@goeforlaw.com;goeforecf@gmail.com;Goe.RobertP.R@notify.bestcase.com;ajohnston@goeforlaw.com

Robert P Goe

on behalf of Plaintiff Official Committee of Unsecured Creditors kmurphy@goeforlaw.com
rgoe@goeforlaw.com;goeforecf@gmail.com;Goe.RobertP.R@notify.bestcase.com;ajohnston@goeforlaw.com

Robert P Goe

on behalf of Plaintiff Official Committee Of Unsecured Creditors kmurphy@goeforlaw.com
rgoe@goeforlaw.com;goeforecf@gmail.com;Goe.RobertP.R@notify.bestcase.com;ajohnston@goeforlaw.com

Robert P Goe

on behalf of Attorney Goe Forsythe & Hodges LLP kmurphy@goeforlaw.com
rgoe@goeforlaw.com;goeforecf@gmail.com;Goe.RobertP.R@notify.bestcase.com;ajohnston@goeforlaw.com

Stephan M Brown

on behalf of Plaintiff Maher Abou Khzam ECF@thebklawoffice.com
stephan@thebklawoffice.com;roslyn@thebklawoffice.com;brown.stephanb125317@notify.bestcase.com

Stephan M Brown

on behalf of Interested Party Courtesy NEF ECF@thebklawoffice.com
stephan@thebklawoffice.com;roslyn@thebklawoffice.com;brown.stephanb125317@notify.bestcase.com

Stephan M Brown

on behalf of Interested Party Maher Abou Khzam ECF@thebklawoffice.com
stephan@thebklawoffice.com;roslyn@thebklawoffice.com;brown.stephanb125317@notify.bestcase.com

Sweeney Kelly

on behalf of Defendant American Express National Bank kelly@ksgklaw.com

Theodore A Cohen

on behalf of Defendant Nexstar Media Inc. tcohen@sheppardmullin.com mtzeng@sheppardmullin.com

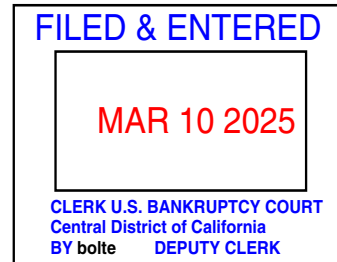
Theodore A Cohen

on behalf of Defendant Nexstar Broadcasting Inc. tcohen@sheppardmullin.com mtzeng@sheppardmullin.com

United States Trustee (SA)

ustpregion16.sa.ecf@usdoj.gov

TOTAL: 70



**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION**

In re:

2nd Chance Investment Group, LLC,

Debtor(s).

Case No.: 8:22-bk-12142-SC

CHAPTER 11

**ORDER RE (1) CLOTEE DOWNING'S
OMNIBUS MOTION FOR APPOINTMENT OF
PRO BONO COUNSEL PER FRCP RULE
17(C)(2), AND FOR RELIEF FROM ORDER
AUTHORIZING SALE OF REAL PROPERTY
(DOC 313) UNDER FRCP RULE 60(b)(2), (3),
(4) and/or (6), OR IN THE ALTERNATIVE,
(d)(3) [DK. 445]; and (2) CLOTEE
DOWNING'S EX PARTE MOTION TO
CONTINUE HEARING TO AUGUST 2025,
AND TO IMMEDIATELY APPOINT
COUNSEL [DK. 467]**

Vacated Hearing:

Date: March 12, 2025

Time: 1:30 PM

Courtroom: 5C

The Court, having considered Clotee Downing's Omnibus Motion For
Appointment of Pro Bono Counsel Per FRCP Rule 17(C)(2), and For Relief From Order
Authorizing Sale of Real Property (Doc 313) Under FRCP Rule 60(B)(2), (3), (4) And/Or

(6), Or In The Alternative, (D)(3) filed November 20, 2024 [Dk. 445] (“Reconsideration Motion”), Clotee Downing’s Ex Parte Motion To Continue Hearing To August 2025, And To Immediately Appoint Counsel filed February 19, 2025 [Dk. 467] (“Motion to Continue”) (collectively, Motions), all relevant pleadings, the docket as whole, and for the reasons stated below, finds good cause to DENY the Reconsideration Motion, DENY the Motion to Continue as it is moot, and VACATE the March 12, 2025 hearing.

Geoff Trapp (“Mr. Trapp”) signed and filed the Reconsideration Motion and Motion to Continue as “An Incompetent Person Without a Representative, suing by her Next Friend Geoff Trapp as permitted by FRCP Rule 17(c)(2).” Mr. Trapp, however, has failed to provide evidence that he is authorized and legally permitted to represent Ms. Downing before this Court. As previously noted by the Court, his representation of Ms. Downing, without counsel, constitutes the unauthorized practice of the law by Mr. Trapp.¹ Dk. 328; See e.g., *Schmitz v. Asman*, 2024 U.S. Dist. LEXIS 101796, at *9 (E.D. Cal. June 7, 2024), *vacated on other grounds* (“a non-attorney guardian ad litem must have counsel in order to litigate a case”). While Mr. Trapp has not been appointed a next friend, a guardian ad litem, or a conservator, even if he had been, as a non-attorney, he is not permitted to practice law on behalf of others. *Berrios v. N.Y.C. Hous. Auth.*, 564 F.3d 130, 134 (2d Cir. 2009) (“If the representative of the minor or incompetent person is not himself an attorney, he must be represented by an attorney in order to conduct the litigation.”).

Further, Mr. Trapp’s reliance on FRCP 17 is misplaced. FRBP 7017, in relevant part, makes FRCP 17 applicable in adversary proceedings. The Motions, however, are filed in the main case, not in an adversary proceeding, and so FRCP 17 is inapplicable. Additionally, FRCP 17 pertains to the appointment of a next friend or guardian ad litem,

¹ In an order entered December 5, 2023 [Dk. 329], this Court previously noted that Mr. Trapp’s presentation of motions before the Court constituted the unauthorized practice of law. Further, the Court notes that an appeal filed in adversary 8:24-ap-01105 was dismissed by the United States Bankruptcy Appellate Panel of the Ninth Circuit as Mr. Trapp failed to timely respond to the BAP Clerk’s Order requiring Mr. Trapp to file a response explaining in what capacity he was representing Clotee Downing in the appeal and what authority authorized him to prosecute an appeal on Clotee Downing’s behalf. Adv. 8:24-ap-01105, Dk. 45.


1 not the appointment of counsel. FRCP 17(c)(2); *Tackett v. United States HHS*, 2021
2 U.S. Dist. LEXIS 251119, at *4 (D. Mont. May 7, 2021). Therefore, Mr. Trapp's request
3 for counsel to be appointed is denied.

4 Accordingly, the Court finds good cause to order as follows:

- 5 1. The Reconsideration Motion is DENIED.
- 6 2. Geoff Trapp's request for the appointment of counsel is DENIED.
- 7 3. The Motion to Continue is DENIED.
- 8 4. The March 12, 2025 hearing is VACATED.
- 9 5. Geoff Trapp is cautioned that any further pleadings filed by him personally,
10 without counsel, on behalf of Clotee Downing may result in the Court issuing
11 an order to show cause as to why such pleadings should not be rejected for
12 the unauthorized practice of law.

13 **IT IS SO ORDERED.**

14
15
16
17
18
19
20
21
22
23
24
25 Date: March 10, 2025


Scott C. Clarkson
United States Bankruptcy Judge

NOTICE OF ENTERED ORDER AND SERVICE LIST

Notice is given by the court that a judgment or order entitled (*specify*) **ORDER RE (1) CLOTEE DOWNING'S OMNIBUS MOTION FOR APPOINTMENT OF PRO BONO COUNSEL PER FRCP RULE 17(C)(2), AND FOR RELIEF FROM ORDER AUTHORIZING SALE OF REAL PROPERTY (DOC 313) UNDER FRCP RULE 60(b)(2), (3), (4) and/or (6), OR IN THE ALTERNATIVE, (d)(3) [DK. 445]; and (2) CLOTEE DOWNING'S EX PARTE MOTION TO CONTINUE HEARING TO AUGUST 2025, AND TO IMMEDIATELY APPOINT COUNSEL [DK. 467]** was entered on the date listed above and will be served in the manner indicated below:

I. SERVED BY THE COURT VIA U.S. MAIL: A copy of this notice and a true copy of this judgment or order was sent by U.S. Mail, first class, postage prepaid, to the following person(s) and/or entity(ies) at the address(es) indicated below:

Clotee Downing
2551 East Avenue S, Suite G-166
Palmdale, CA 93550

Geoff Trapp
2551 East Avenue S, Suite G-166
Palmdale, CA 93550